

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 23-5109
(C.A. No. 19-1746)

MAHTAB ARSANJANI,

Appellant,

v.

UNITED STATES OF AMERICA, et al.,

Appellees.

**THE UNITED STATES OF AMERICA’S CONSENT MOTION
FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS**

Pursuant to Circuit Rule 27, Appellee United States of America (“United States”), respectfully moves to extend the deadline to file all dispositive motions. The parties’ dispositive motions are currently due by June 29, 2023. For the reasons set forth below, the United States, with the parties’ consent, requests that the Court extend the June 29, 2023, deadline to August 7, 2023. This Motion is timely submitted six days prior to the June 29, 2023, deadline.

In this case, Arsanjani alleges she was struck by a tree branch while walking on the sidewalk located at Constitution Avenue, NW, at or near its intersection with 9th Street, NW, in the District of Columbia on June 19, 2016.

There is good cause to grant this Motion. Over the past few weeks, undersigned counsel has devoted a substantial amount of time to more than three dispositive motions (or replies) and myriad pleadings and joint status reports.

Unfortunately, the demands of undersign counsel's large docket of active cases have prevented undersigned counsel from completing the research and consultation with the Smithsonian counsel and supervising Assistant United States Attorneys necessary for finalizing the dispositive motion. Additional time is needed so that the undersigned counsel can complete the research, draft the motion, and submit any draft motion for the Smithsonian and supervisory review prior to filing it with the Court. Consequently, the United States respectfully requests a reasonable amount of additional time, in light of undersigned's busy schedule, to and through August 7, 2023, to conduct legal research and finalize its dispositive motion.

Further, undersigned counsel conferred with Arsanjani and the District, through counsel, and both parties' consent to the extension and request that their time also be extended, to and through August 7, 2023. Because all of the parties' request that the June 29, 2023, deadline be extended to August 7, 2023, the requested extension would not prejudice any of the parties. Lastly, the requested extensions will not significantly delay the Court's resolution of this matter.

In light of the foregoing, the United States, with the parties' consent, respectfully request that the Court extend the parties' deadline to file to their dispositive motions to August 7, 2023.

* * *

Dated: June 23, 2022

Respectfully submitted,

MATTHEW M. GRAVES, D.C. Bar # 481051
United States Attorney

BRIAN P. HUDAK
Chief, Civil Division

/s/ Stephanie R. Johnson
STEPHANIE R. JOHNSON
D.C. Bar # 1632338
Assistant United States Attorney
601 D Street, N.W.
Washington, D.C. 20530
(202) 252-7874
Stephanie.Johnson5@usdoj.gov

Attorneys for the United States of America

CERTIFICATE OF COMPLIANCE

The text of this Motion is prepared using 14-point Times New Roman typeface and consists of 361 words, as calculated by counsel's word processor.

/s/ Stephanie R. Johnson

Stephanie R. Johnson

Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of June 2023, I have caused the foregoing United States of America's Consent Motion for Extension of Time to File Dispositive Motions to be served on the parties' counsel by filing the Certificate on the Court's CM/ECF system. Counsel are registered users.

/s/ Stephanie R. Johnson

Stephanie R. Johnson

Assistant United States Attorney